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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, CHRISTOPHER)	CIVIL NO. 03-00567 JMS BMK
GAHR, FRANK ROBERT PAULSON,)	
CHARLES TURNER, and TOM)	DEFENDANTS' MOTION TO REOPEN
YOUNG,)	DISCOVERY; MEMORANDUM IN
)	SUPPORT OF DEFENDANTS' MOTION
Plaintiffs,)	TO REOPEN DISCOVERY;
)	DECLARATION OF THOMAS A.
vs.)	HELPER; EXHIBITS A-C;
)	CERTIFICATE OF SERVICE
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendant.)	
_____)	

DEFENDANTS' MOTION TO REOPEN DISCOVERY

Pursuant to Rule 16 of the Federal Rules of Civil Procedure,
defendants hereby move this court to reopen discovery on the
narrow issue of the authority plaintiffs Gahr and Bruno granted

to their attorneys to settle this action. The grounds for this motion are set forth in the attached memorandum in support.

DATED: Honolulu, Hawaii, August 3, 2006.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Thomas A. Helper
THOMAS A. HELPER
United States Attorney

Attorneys for Defendant

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LUCAS BRUNO III, CHRISTOPHER)	CIVIL NO. 03-00567 JMS BMK
GAHR, FRANK ROBERT PAULSON,)	
CHARLES TURNER, and TOM)	CERTIFICATE OF SERVICE
YOUNG,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the date and by the method of service noted below, a true and exact copy of the foregoing document was served on the following at their last known address:

Served by First Class mail: August 3, 2006

Michael Jay Green, Esq.
Debra A. Kagawa, Esq.
Denise M. Hevicon, Esq.
345 Queen Street, Second Floor
Honolulu, HI 96813

DATED: Honolulu, Hawaii, August 3, 2006.

/s/ Coleen Tasaka-Shoda